#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10294 DPW

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

MICHELLE TREBITSCH, On Behalf Of Herself and All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10307 DPW

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

INFORMATION DYNAMICS, LLC, On Behalf of Itself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

[Additional Captions Follow on Next Page]

Civil Action No. 04-CV-10308 DPW

#### MOTION TO ADMIT COUNSEL PRO HAC VICE

PETER KALTMAN, On Behalf of Himself and All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10309 DPW

v.

SONUS NETWORKS, INC., RUBEN GRUBER, HASSAN AHMED and STEPHEN NILL,

Defendants.

SAMANTHA DEN, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10310 DPW

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

RICHARD CURTIS, Individually And on Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10314 MLW

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

RONALD KASSOVER, on Behalf of the Ronald Kassover IRA and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

STEVE L. BAKER, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

MICHAEL KAFFEE, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10329 DPW

Civil Action No. 04-CV-10333 DPW

Civil Action No. 04-CV-10345 DPW

HAIMING HU, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-10346 DPW

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

CHARLES STARBUCK, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10362 DPW

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

SAMUEL HO, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10363 DPW

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

JEFFREY C. RODRIGUES, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

ROBERT CONTE and MARK RESPLER, Themselves and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

WHEATON ELECTRICAL SERVICES RETIREMENT 401K PROFIT SHARING PLAN, On Behalf of Itself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10364 DPW

Civil Action No. 04-CV-10382 DPW

Civil Action No. 04-CV-10383 DPW

BRIAN CLARK, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10454 DPW

v.

SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'HARA, HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

SHEILA BROWNELL, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV- 10597 DPW

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

SAVERIO PUGLIESE, On Behalf of Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10612 DPW

SAVERIO PUGLIESE, On Behalf of Himself and All Others Similarly

Situated,

Civil Action No. 04-CV-10612-DPW

Hon. Douglas P. Woodlock

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, and STEPHEN J. NILL,

Defendants.

Pursuant to Local Rule 83.5.3, the undersigned counsel, Michael T. Matraia, hereby moves that this Court enter an Order granting leave to Richard A. Speirs of the law firm Zwerling Shachter & Zwerling, LLP to appear on behalf of plaintiff Saverio Pugliese and practice before this Court in the above-entitled civil action.

As grounds for this motion, the undersigned represents the following:

- Richard A. Speirs is admitted to the bar of the State of New York (1986), the 1. United States District Court of the Southern District of New York (1987), the United States District Court for the Eastern District of New York (1987), and the United States Court of Appeals for the Tenth Circuit (1997).
- There are no disciplinary proceedings pending against Richard A. Speirs as a 2. member of the bar in any jurisdiction.
- Richard A. Speirs has represented to the undersigned counsel that he is familiar 3. with the Local Rules of the United States District Court for the District of Massachusetts.

Richard A. Speirs has submitted herewith his Certification For Admission Pro 4.

Hac Vice as required by Local Rule 83.5.3. See Exhibit A.

Dated: April 30, 2004

# BERMAN DEVALERIO PEASE TABACCO **BURT & PUCILLO**

/s/ Michael T. Matraia

Jeffrey C. Block, BBO # 600747 Michael T. Matraia, BBO # 633049 Nicole R. Starr, BBO #654848 One Liberty Square Boston, Massachusetts 02109 (617) 542-8300

# ZWERLING, SCHACHTER & ZWERLING, LLP

Richard A. Speirs Kevin M. McGee 845 Third Avenue New York, NY 10022

Phone: (212) 223-3900 Fax: (212) 371-5969

### **RULE 7.1 CERTIFICATION**

Plaintiffs informed defendants of the filing of this motion. Counsel for defendants have not notified plaintiffs that they object to the relief sought in the motion.

> /s/ Michael T. Matraia Michael T. Matraia

Sonus/dp/prohacmotion\_Speirs